

REPRESENTATIONS TO THE REGULATION 18 DRAFT GREATER NORWICH LOCAL PLAN

LAND AT:

**PARK FARM, BIXLEY
SITE REF GNLP0323**

**OCTAGON FARM, FRAMINGHAM EARL
SITE REFS GNLP1032 AND GNLP0321**

**WHITLINGHAM COUNTRY PARK (WCP)
SITE REF GNLP3052**

**LODDON ROAD AND BUNGAY ROAD, BIXLEY (P&R)
SITE REF GNLP3051**

ON BEHALF OF CROWN POINT ESTATE

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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CONTENTS:

Page No:

APPENDIX A - TRANSPORT TECHNICAL NOTE BY ROYAL HASKONING DHVINTRODUCTION	1
2. PART 1 PLAN – THE STRATEGY	3
Section 1 – Introduction	3
Section 2 – Greater Norwich Spatial Profile	4
Section 3 – The Vision and Objectives for Greater Norwich	5
Section 4 – The Delivery of Growth and Addressing Climate Change	7
Section 5 – The Strategy	9
Overarching Consultation Question	16
3. THE PART 2 PLAN – SITE ALLOCATIONS	31
4. SUMMARY AND CONCLUSION	39

Appendix A - Transport Technical Note by Royal Haskoning DHV

Introduction

- 1.1 These representations to the Greater Norwich Draft Local Plan (Regulation 18) (hereafter referred to as 'the GNLP') are made by Pegasus Group on behalf of the Crown Point Estate, which has various development interests to the south of Norwich which are being promoted through the Local Plan process – these representations are made in relation to the following sites:
 - 1.2 Park Farm, Bixley – site ref GNLP0323, 9.83ha;

Octagon Farm, Framingham Earl – site refs GNLP1032, 4.2ha and GNLP0321, 4.28ha (we promote these sites as a single entity);

Whitlingham Country Park (WCP) – site ref GNLP3052, 200ha;

Land at Loddon Road and Bungay Road, Bixley – site ref GNLP3051, 7.91ha. We promote this site for a Park & Ride, and it is hereinafter referred to as Loddon P&R.
- 1.3 The Draft Reg 18 Plan sets out proposed overarching policies at Part 1: The Strategy, and assesses all sites proposed for allocation in Part 2: Site Allocations. The Bixley Farms sites are assessed in Part 2, but the assessments are based largely on the intentions set by the strategic policies in Part 1, which themselves have been informed by an Evidence Base suite of policy and research documents. We therefore respond to both Parts of the Plan in this document, insofar as they relate to the four sites. We also comment, where appropriate, on the Evidence base documents that have informed the Draft Plan.
- 1.4 We note that that South Norfolk Council intends to prepare a separate village clusters plan covering sites for small-scale housing. The South Norfolk website currently refers back to the GNLP consultation, so we request that our responses to the GNLP will be used to inform the future work on the South Norfolk site allocations document. We also note that development management policies will remain within District-level Plans and are not proposed to be covered by the GNLP.

2. Part 1 Plan – The Strategy

Section 1 – Introduction

2.1 Q1: Please comment on or highlight any inaccuracies within the introduction

2.2 We note that the introduction includes:

"14. Transport priorities which influence the GNLP are set out in several other strategies including: the Norfolk Local Transport Plan; the Norwich Area Transportation Strategy; the emerging Transport for Norwich strategy and Transforming Cities. These are in addition to national and regional rail and road investment strategies and programmes."

2.3 The Norfolk Local Transport Plan and the Transport for Norwich strategy are both currently in the early stages of review, with no published drafts. The current Norfolk Local Transport Plan was published in 2011, and the Norwich Area Transportation Strategy was adopted in 2004 (with Implementation Plan update in 2013). Given the age of these documents, we suggest they have reduced influence on the transport priorities of the GNLP, especially when considering the additional emphasis that has been placed on sustainable transport in recent years and the technological and social changes which have resulted in modal shift. In order to future-proof the transport priorities of the GNLP, it is considered to be essential that the evidence base relied upon is up-to-date, or that contingencies are ensconced within the GNLP. We therefore anticipate commenting further within the GNLP process once these documents are published as part of the wider evidence base.

Section 2 – Greater Norwich Spatial Profile

2.4 Q4: Are there any topics which have not been covered that you believe should have been?

2.5 Paragraph 54 of the Draft Plan states:

“Greater Norwich is key to the region's economy with considerable potential for growth in world class knowledge intensive jobs. Strategic employment sites and competitive land and business lets, mainly those in and around the Norwich and Wymondham area, support a globally significant growth axis within the Cambridge Norwich Tech Corridor.”

2.6 The Greater Norwich economy includes life-sciences, agri-tech, IT, leisure and culture, and retail. The Greater Norwich City Deal 2013 focusses on science, technology and advanced manufacturing. Paragraph 60 of the Draft Plan notes that “Rural enterprises are important to the local economy and home working is increasing in significance. The proportion of micro-businesses employing up to nine people is above the national average in Broadland and South Norfolk.”

2.7 We consider that whilst the GNLP emphasises the growth of hi-tech and food-tech industries, it has not addressed the low-tech sector. Whilst rural businesses are acknowledged as important to the local economy, we are concerned that this acknowledgement is not translated into policy later in the GNLP. We discuss this further, later in this representation.

2.8 Norwich City Centre has largest concentration of employment in Greater Norwich and is a focus for further employment growth. Paragraph 78 of the Draft Plan notes that successful modal shift has already been achieved through previous Transport for Norwich programme, with a 375,000 increase in Norwich bus journeys. This requires building on, with further improvement of the Park and Ride network which will allow capacity to rise in line with demand as more journeys switch to bus and as the growth strategy comes to fruition. The Draft Plan is constrained by a lack of detail on the Transport for Norwich review. This will include the Park and Ride network. We are promoting the Loddon P&R site, located on the only major transport route into Norwich without P&R facilities, as part of the solution to ongoing strategies to achieve sustainable transport and modal shift.

Section 3 – The Vision and Objectives for Greater Norwich

- 2.9 Q6: Do you support or object to the vision and objectives for Greater Norwich?
- 2.10 Transport modal shift is supported, however, it is not considered that the GNLP currently provides enough detail or methods on how this vision is to be achieved, particularly in terms of the infrastructure improvements. The Draft Plan is constrained by a lack of detail on the Transport for Norwich review. This will include the Park and Ride network. We are promoting the Loddon P&R site, located on the only major transport route into Norwich without P&R facilities, as part of the solution to ongoing strategies to achieve sustainable transport and modal shift.
- 2.11 The support for electric vehicles is encouraging, however detail needs to be provided as to where the charging infrastructure for these electric vehicles is to be located. While new development may be able to provide private charging where viable, this does not cater to the charging of electric vehicles where owners do not have that facility at home or work, and it will take time and incentives for existing development to retro-fit the necessary infrastructure. It is considered that public EV charging stations will be necessary and the proposed Loddon Park & Ride site that we are promoting will allow the opportunity for charging infrastructure to be embedded into that development from the start.
- 2.12 The Vision for Greater Norwich to 2038 includes stimulating economic investment and “the creation of a strong, enterprising, productive and broad-based economy, and the growth of a wide range of economic sectors” (para 113), which we support. “Most of the jobs growth we expect to see will have been delivered on strategic sites in and around Norwich with good access to public transport, the major road network and a comprehensive cycling network.” (para 114). “Parallel to this, the role of smaller scale employment sites elsewhere in the urban area, market towns and villages will help to deliver good access to jobs for all.” (para 116).
- 2.13 As noted above, we are concerned that the need for low-tech employment space has not been translated into policy, which we discuss under Section 5 below.

Without that issue being addressed jobs will not be available “for all” as desired by the Vision.

- 2.14 In terms of leisure, the Plan’s vision is noted at paragraph 133: “The development of a multi-functional green infrastructure network will continue across Greater Norwich. This enhanced network will have helped our communities mitigate and adapt to the effects of climate change, by providing for biodiversity gain through improved and linked habitats, reducing flood risk and improving opportunities for active travel and leisure. Improved access to the countryside will have been provided and the quality of our environmental assets will have been enhanced. Visitor pressure on the Broads and other internationally and nationally protected sites will be reduced by new and improved green infrastructure both on and linked to developments, including delivery of the North West Woodland Country Park in Horsford.”
- 2.15 We consider it is important that development and green infrastructure go hand-in-hand. We note that the GNLP proposes significant new development to the East and South-East of Norwich, in the vicinity of the Whitlingham Country Park (WCP). To support the GNLP’s vision for improved opportunities for active travel and leisure, we consider that additional land at WCP, site reference GNLP3052, should be safeguarded for the future delivery of green infrastructure. This relates geographically to the extensive new development proposed by the GNLP to the South and South-East of the City, and would therefore be linked to those developments. It should be supported in addition to the Country Park at Horsford, which is to the North-West of the city. Policies to safeguard the additional land for future country park use will facilitate confidence in investment in the site.
- 2.16 The Plan’s objectives leading from this vision, as they relate to the economy, environment and housing are as follows:
- 2.17 “Economy - To support and promote clean growth and progress towards a post-carbon economy through the expansion of internationally important knowledge-based industries in the Cambridge Norwich Tech Corridor as part of an entrepreneurial, enterprising, creative and broad-based economy with high productivity and a skilled workforce.

- 2.18 “The vision in the draft Local Plan states that future job growth in and around Norwich will happen in locations where there is good access to public transport and the major road network.
- 2.19 “Environment - To protect and enhance the built, natural and historic environments, make best use of natural resources, and to significantly reduce emissions to ensure that Greater Norwich is adapted to climate change and plays a full part in meeting national commitments to achieve net zero greenhouse gas emissions by 2050.
- 2.20 “Homes - To enable delivery of high-quality homes of the right density, size, mix and tenure to meet people's needs throughout their lives and to make efficient use of land.”
- 2.21 We support these objectives, and we comment in Section 5 below on the way they have been translated into policy.

Section 4 – The Delivery of Growth and Addressing Climate Change

- 2.22 Q9: Do you support, object, or have any comments relating to the approach to Housing set out in the Delivery Statement?
- 2.23 The Delivery Statement for Housing includes that “Additional opportunities will be provided, particularly for small scale growth at villages and on small brownfield sites across Greater Norwich, through windfall development.”
- 2.24 The additional opportunities need to be clarified in relation to small-scale housing at villages and windfall sites. We discuss this further under policy 7.5 below, but raise here that sites on the edges of villages should be encouraged, in order to ensure ongoing vitality and viability of village life whilst not undermining the wider spatial strategy. We consider that arbitrary numeric restrictions on housing should be replaced by policy wording that relates to the character and appearance of the locality of such sites.
- 2.25 Q10: Do you support, object, or have any comments relating to the approach to Economic Development set out in the Delivery Statement?

- 2.26 The Delivery Statement for Economic Development includes that “Smaller scale and rural employment sites are less likely to be constrained by infrastructure requirements and will be supported in accessible and sustainable locations. Together, these varied sites provide for growth of both a broad based and a high value knowledge economy.”
- 2.27 We support this approach. However, “smaller scale” is not defined. We anticipate that the development management policies of each Council will control details of such provision, but it is important in the GNLP that appropriate sites are formally allocated. Without allocation, sites will be classed as countryside, where general development management policies would rule against their use for employment. For example, we are promoting Park Farm as an employment allocation, which will ensure that potential occupiers will be confident in the planning process to secure their use.
- 2.28 The Delivery Statement also refers to a high value knowledge economy, but it must be borne in mind that low value, low-tech uses also play a vital role in the wider economy in terms of jobs that are not knowledge-based. Such employment relies on lower-cost rural sites, as they are priced out of new-build business parks in more central locations.
- 2.29 Q11: Do you support, object or have any comments relating to the approach to Infrastructure set out in the Delivery Statement?
- 2.30 The infrastructure priorities referred to in the Delivery Statement are supported, particularly the reference to the broad intent for a shift to sustainable modes of transport. However as discussed above from the perspective of Park & Rides there is little contained in the Local Plan which substantially moves the situation forward in terms of allocating sites for P&R to meet the increase in demand which will occur if the objectives of the GNLP for modal shift are met.
- 2.31 We are promoting the Loddon P&R site, and will be adding to representations once the review of P&R is published as an evidence base document.
- Q12: Do you support, object, or have any comments relating to the Climate Change Statement?
- 2.32 We include this in our comments on the policies in section 5 below.

Section 5 – The Strategy

Policy 1 The Sustainable Growth Strategy

- 2.33 Q13: Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?
- 2.34 Our concern relates to opportunities for windfall developments outside village boundaries. Windfalls are considered by the GNLP to relate to small sites within built-up parts of villages, leaving no positive planning policy support or control over village edge sites. It is important that windfall sites are defined in a way that includes edge of settlement sites, controlled by policies regarding sustainability, accessibility, character and appearance, rather than arbitrary figures. We expand on this under the windfall policy 7.5 below.
- 2.35 Q14: Do you support, object or wish to comment on the approach for housing numbers and delivery?
- 2.36 We are concerned that the Plan relies on the, yet to be formulated, South Norfolk Village Clusters Housing Sites Allocation document. Without this, there is no evidence that the GNLP's target numbers can be met, which may well lead to a delay in the GNLP process. Such approach is inconsistent with paragraphs 20 and 23 of the NPPF, which require that Councils make sufficient provision for housing through strategic policies that provide a clear strategy for bringing sufficient land forward.
- 2.37 Despite the representation of housing numbers as a minimum figure, the reality at planning application stage is that sites that have not been allocated will be technically contrary to policy. Additionally, the housing numbers should be sufficient to keep up with additional job numbers, anticipated and indeed promoted by the GNLP to facilitate growth. It is therefore imperative that opportunities to allocate sites for housing are taken. We are promoting land at Octagon Farm for mixed use development, building upon the presence of the business use of the converted Octagon Barn and mindful of the presence of new development on the opposite side of the road and the presence of the site on the edge of Poringland, a high order settlement in the hierarchy which has no

proposed new allocations. We consider that this site should be allocated to support sustainable growth.

2.38 Q15: Do you support, object or wish to comment on the approach for the Economy?

2.39 Policy 1 refers to the allocation of smaller scale employment sites within built up areas, but misses the opportunity to support the allocation of sites where the conversion of existing rural buildings would contribute to employment in lower value sectors, where premium locations would prevent such businesses from establishing.

2.40 Q17: Do you support, object or wish to comment on the approach to Infrastructure?

2.41 We welcome the support for improvements to the transport system, but these need to be clarified. We are promoting the Loddon P&R site as a means by which the GNLP can improve P&R provision on the last remaining main route into the city.

2.42 We welcome the support for improvements to green infrastructure. We consider that the additional land at WCP should be safeguarded for such improvements, to promote confidence that the proposed allocations for developments in the vicinity will be able to rely on support for investment therein.

Policy 3 Environmental Protection and Enhancement

2.43 Q21: Do you support, object or have any comments relating to the approach to the natural environment?

2.44 Paragraph 181 of the Draft Plan notes that “The development of a multi-functional green infrastructure network was formalised locally through the Joint Core Strategy in 2011. It is essential that the network continues to be developed into the long-term as green infrastructure aims to link fragmented habitats, allowing the movement of species. It also has other benefits such as reducing flood risk and promoting active travel.”

2.45 Policy 3 translates this into a requirement to enhance the Green Infrastructure Network, which “may include the establishment of a new country park or parks”.

- 2.46 We see the additional land at WCP as providing an opportunity to facilitate the required enhancements to the network where required to support development in the area, offering genuine additional space as well as the opportunity to enhance the existing space. Safeguarding the additional land for that purpose will provide confidence to those seeking to provide such space and facilities as SANGS associated with development sites, as well as those wishing to propose a variety of leisure activities in a green context.

Policy 4 Strategic Infrastructure

- 2.47 Q23: Do you support, object or have any comments relating to approach to transport?

- 2.48 Policy 4 states that the role of the Park and Ride system will be developed in order to facilitate the move towards sustainable modes of transport and a reduction of the reliance on travel by cars. We await the publication of the Transport for Norwich Strategy and the fourth local transport plan (Norfolk CC). We are promoting the Loddon P&R site on the last remaining route into the City that lacks P&R provision, and we note that the supporting text states the new TfN strategy is "likely" to include improvement to sustainable transport networks including Park and Ride enhancements. The Loddon P&R site provides the opportunity to support this approach, along with the intended shift to electric vehicle use. We agree that as a rural hinterland, a complete shift away from the private car will be difficult, so efforts should be made to make elective electric vehicle usage easier, with infrastructure planned to be in place for public EV charging facilities. P&R is an ideal scenario for this functionality, which can be built in from the start with a new P&R site more easily than retrofitting.

- 2.49 Q24: Do you support, object or have any comments relating to the approach to other strategic infrastructure (energy, water, health care, schools and green infrastructure)?

- 2.50 Green infrastructure. As noted above under Policy 3, additional land at WCP should be safeguarded for extended country park-related development.

Policy 6 The Economy

- 2.51 Q34: Do you support, object or have any comments relating to the approach to employment land?
- 2.52 Object. Scale is not defined, but business scale should not simply be defined by numbers of employees. Some businesses are low-key but require more space, such as some B8 uses. Larger scale needs are not always able to be accommodated in new-build development sites, but rely on lower-cost rural sites, as they are priced out of new-build business parks in more central or prominent locations.
- 2.53 In terms of the conversion of rural buildings, we anticipate that the development management policies of each Council will control details of such provision, but it is important in the GNLDP that appropriate sites are formally allocated, for example where there are clusters of such buildings that would usefully provide low-cost, low-tech business space. Without allocation, sites will be classed as countryside, where general development management policies would rule against their use for employment. For example, we are promoting Park Farm as an employment allocation, which will ensure that potential occupiers will be confident in the planning process to secure their proposed use.
- 2.54 We are also promoting Octagon Barn for a mixed use site, which will include employment, building upon the current employment use of the converted barn, which is a local destination. Independent businesses such as independent shops, galleries, workshops, garden centres and tea rooms rely on rural locations both for viability and for character. Expanding this existing offer with appropriate new-build will only be achievable if the site is allocated for development, since development management policies would not permit new buildings in the countryside. Space is not always available within the built-up parts of villages, so land at the edge is an appropriate location for such activities that would support the vitality and viability of the village, whilst remaining at a scale that is appropriate to the location.
- 2.55 Strategic growth in the city centre will need to be supported by accessibility, yet a reduction in traffic congestion and improvements in air quality. The P&R facilities will need to cater for these issues. The publication of the P&R review will require further input, but we submit a Transport Technical Note at Appendix A, setting out how the Loddon P&R site could be provided.

- 2.56 Q35: Do you support, object or have any comments relating to the approach to tourism, leisure, environmental and cultural industries?
- 2.57 As noted above under Policy 3, additional land at WCP should be safeguarded for extended country park-related development. This will enable the enhancement of green space and the provision of a variety of leisure activities. Safeguarding the additional land for this purpose will provide confidence in investment in country park-related development, within a positive planning background.
- 2.58 Q36: Do you support, object or have any comments relating to the sequential approach to development of new retailing, leisure, offices and other main town centre uses?
- 2.59 As noted above under question 34, we are promoting Octagon Barn for mixed use development including small-scale business / retail use to enhance the use of the site as a local destination. Policy 6 concludes with a stated desire to enhance the environment and economy of villages. However, the Town Centres element of the policy doesn't distinguish between types of retail use. The hierarchy of defined centres in the policy is appropriate for chain stores and supermarkets, but the retail offer of independents cannot compete with these businesses in high value locations. The policy should make clear the type and/or size of retail uses required to follow a sequential test.
- 2.60 Q37: Are there any topics which have not been covered that you believe should have been?
- 2.61 As noted under question 36 above, independent retail uses are not clarified or accommodated in the Town Centres element of Policy 6. It should be acknowledged that independent businesses have a vital role to play in the vitality and viability of the rural community, and should be accommodated at or close to the edge of villages from which they can draw employees and customers. Such businesses can become destinations for the wider community, but at low numbers, and tend to be relatively localised. We are promoting the allocation of Octagon Farm on the edge of Poringland (a high order settlement), where the present uses of the converted barn can be built upon with additional development that will support that business through linked trips.

Policy 7 Strategy for the Areas of Growth

Policy 7.1 – The Norwich Urban area including the fringe parishes

- 2.62 Q38: Do you support or object or wish to comment on the approach for the city centre? Please identify particular issues.
- 2.63 The growth of the city centre is supported as a sustainable location for growth. However, this should be matched by accessibility. We are promoting the Loddon P&R site to ensure that all road routes into the city are provided with Park and Ride sites to facilitate sustainable “final mile” journeys into the city, with associated benefits to congestion and air quality in the city centre. Without the support of infrastructure, growth in the city risks not being sustainable.
- 2.64 Q39: Do you support or object or wish to comment on the approach for East Norwich? Please identify particular issues.
- 2.65 We support the allocation of East Norwich and note the intention for sustainable accessibility and traffic restraint, and for links between the city centre and Whitlingham Country Park. The addition of 2,000 additional homes in this location, as well as other uses, will result in significant additional population living and working on the site. This makes it even more important that Park & Ride facilities are located in close proximity, to ensure sustainable access. The pressure from additional population within a high density development, where land is at a premium, may need to be met by SANGS. The additional land at WCP should be safeguarded for this purpose within the Plan.

Policy 7.3 – The Key Services Centres

- 2.66 Q43: Do you support or object or wish to comment on the approach for the key service centres overall? Please identify particular issues.
- 2.67 We object to the reference in paragraph 340 to an arbitrary limit of 3 dwellings for windfall sites outside settlement boundaries. This suggests that 4 dwellings would be unacceptable, yet would clearly not undermine the settlement hierarchy or be out of character with a village edge, and neither would 5 houses or 10. The policy should relate to character and appearance, with sites referring to natural boundaries on the ground rather than contrived sites or sites that do

not make the best use of land. We comment more fully on this point under question 47 below.

- 2.68 Q44: Do you support or object or wish to comment on the approach for specific key service centres: (Acle, Blofield, Brundall, Hethersett, Hingham, Loddon / Chedgrave, Poringland / Framingham Earl, Reepham, Wroxham)? Please identify particular issues.
- 2.69 Poringland / Framingham Earl. The lack of new allocations in the policy fails to acknowledge the need for settlements to continue to grow. We are promoting Octagon Farm for mixed use development on the northern edge of Poringland. This will consolidate existing development in the vicinity, including Octagon Barn and the residential development on the opposite side of Bungay Road. The mixed use nature of the site will facilitate homes and employment that will contribute to the vitality of this high order sustainable settlement.
- 2.70 Without new site allocations, Poringland will be unable to meet ongoing needs for affordable housing and community-related contributions that arise from housing applications. Restricting new sites to 3 units (under the windfall policy) will not produce the contributions that would otherwise support the vitality of the community. The opportunity to allocate Octagon Farm for mixed use development should therefore be grasped.

Policy 7.5 – Small Scale Windfall Housing Development

- 2.71 Q47: Do you support or object or wish to comment on the overall approach for Small Scale Windfall Housing Development? Please identify particular issues.
- 2.72 Windfall sites are an important element of overall housing provision, and are often able to be provided quickly and by a variety of providers due to their smaller size in relation to major development sites. Policy 7.5 should omit the reference to 3 dwellings. The final sentence of the policy will ensure that development proposals respect the settlement hierarchy, the character and appearance of the area, and their relationship to site context and boundaries.
- 2.73 Restricting windfall sites to 3 units means that the threshold for affordable housing will not be able to be met, whereas encouraging larger developments

within the parameters suggested above would yield genuine benefits to the communities that such sites are associated with.

Overarching Consultation Question

2.74 Q48: Do you support or object or wish to comment on any other aspect of the draft plan not covered in other questions? This includes the appendices below and the evidence base on the web site. Please identify particular issues

2.75 We comment below on the following elements of the Evidence Base:

2.76 **Appendix 1 Infrastructure Requirements** (and by extension Greater Norwich Local Plan Infrastructure Needs Report). It is disappointing that there is no discussion on the Park and Ride system, or infrastructure for buses in general. There is also no discussion of public charging infrastructure for electric vehicles. We note that the review of Park & Ride sites has yet to be published, but would point out that the allocation of the proposed Loddon P&R site will provide the opportunity to complete the ring of P&R sites to serve each radial road route towards the city, and will be able to facilitate electric vehicle charging points at construction stage rather than by retro-fitting.

2.77 **Greater Norwich Local Plan Infrastructure Needs Report**

2.78 There is no discussion of Park and Ride facilities, or of plans for buses in general – whilst the contents page states section 5.2 Bus and Rail, the section itself only discusses rail. If Greater Norwich is to achieve its vision of sifting towards sustainable transport methods, the requirement for additional bus capabilities and the infrastructure to serve them is a key requirement which must be planned for. The exclusion of bus infrastructure, including P&R facilities, is therefore an oversight which requires addressing. It is our opinion that there is a clear need for an additional P&R along the A146 corridor, and the GNLPINR should therefore include an assessment of further P&R requirements to ensure the appropriate infrastructure can be brought forward.

2.79 **Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan (Jan 2020)**

Loddon P&R

- 2.80 It is considered that the Sustainability Appraisal's (SA) assessment of the Loddon P&R site has been undertaken in an overly broad manner, resulting in negative impacts being stated for categories where this is not justified. The matters will be discussed here in the order taken by the SA.
- 2.81 Objective 1 'Air Quality', the SA states air and noise pollution concerns occur because of its location adjacent to the A146. Any minor negative impact on air and noise quality at the site fails to take account of the circumstances of the site's proposed use and the bigger picture. A Park and Ride will by nature have users which are transitory – being on the site no more than 15 – 30 minutes, and more importantly, the provision of P&R facilities improves air quality within the city centre, by removing cars that would otherwise drive in. Air quality and noise pollution should therefore not be counted as negatives against the proposal.
- 2.82 Under Objective 2 'Climate Change Mitigation and Adaption', the location of the site in Flood Zone 1 should be a major positive impact (rather than minor positive) as the proposal will locate end users on a site with the least possible risk of fluvial and surface water flooding.
- 2.83 Under Objective 3 'Biodiversity', a minor negative impact is stated because of the site being located within 5km of The Broads SAC and Broadlands SPA and Ramsar, and within the IRZ of the Yare Broads and Marshes SSSI. The provision of a P&R site in this location will not add to direct pressure on those sites, and ecological impacts can be mitigated within the design. Impact should therefore be neutral at worst.
- 2.84 The section on Objective 4 'Landscape' states development of the site would have a minor negative impact on the local landscape character. While it is accepted that the introduction of a P&R would invariably alter the character of the site itself, it is considered that impact on the wider countryside character could be appropriately mitigated through careful, landscaping-led masterplanning of the site. A full Landscape and Visual Impact Assessment will be submitted at a later stage to demonstrate the landscape effects of the proposed P&R scheme.
- 2.85 It is unclear how the proposed development could have a negative impact on access to local services, as stated under Objective 6 'Population'. A P&R would

actually have the opposite effect, allowing a greater range of users easier access to services via public transport.

- 2.86 In a similar vein, under Objective 8 'Health' it appears the site has been assessed for health purposes as if the proposal is for housing. The proposal would not restrict access to the Norfolk and Norwich University Hospital. The site being located outside of the target distance of the nearest GP surgery, hospital and leisure centre is not of relevance to the proposed use as a P&R and should therefore not be recorded as a major negative impact.
- 2.87 The major positive impact on the local economy stated under Objective 11 'Economy' is agreed with. As well as creating jobs through the construction and operation of the P&R itself, there will also be a positive impact on the Norwich economy as the P&R will make it easier and more convenient for workers and visitors to travel into the city centre.
- 2.88 Under Objective 12 'Transport', the SA has recorded minor negative impacts in terms of access to bus and rail services. This conclusion is entirely contradictory to the purpose of a Park and Ride which will improve access to bus services for a range of people, allowing access into the city centre in a more convenient and sustainable manner. This should therefore instead be recorded as a major positive impact.
- 2.89 Objective 13 'Historic Environment' states potential impacts to designated heritage assets identified as the setting of the Grade II Listed Bixley Mill, Crown Point Registered Park and Garden, and the Scheduled Remains of Medieval Settlement 380m south of Park Farm. As only a minor negative impact has been identified by the Council, the development of the P&R site is not considered to result in substantial harm to the heritage assets. However, to ensure that development of the site appropriately takes into account the setting of the identified heritage assets, a detailed assessment of the potential impacts will be undertaken to inform the masterplanning of the site. With these measures, it is considered that heritage impact is not an onerous constraint to the allocation of the site.
- 2.90 Under Objective 15 'Water', it is stated that the site is within the catchment (Zone III) of a groundwater SPZ, and minor negative impacts are recorded due to a risk of groundwater contamination. It is considered that this risk can be

effectively mitigated through the implementation of a robust drainage strategy tied in with the use of appropriate hard surfacing across the site, and there would therefore be no negative impacts.

Park Farm

- 2.91 Park Farm has not been assessed in the Sustainability Appraisal. However, we make the following points:
- 2.92 Objective 11 – Economy. Development proposals which would result in a net increase in employment floorspace would be expected to have a major positive impact on the local economy.
- 2.93 Objective 14 – Natural Resources, Waste and Contaminated Land. In accordance with the core planning principles of the NPPF, development on previously developed land will be recognised as an efficient use of land. Development of previously undeveloped land and greenfield sites is not considered to be an efficient use of land, but there are wider considerations as to the appropriate use of greenfield sites. Development of an existing brownfield site would be expected to contribute positively to safeguarding greenfield land in Greater Norwich and have a minor positive impact on this objective.

WCP

- 2.94 SA Objective 1 – Air Quality and Noise notes that development at WCP could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using the A47 and A146 would be expected to have a minor negative impact on air quality and noise at these sites. We propose that WCP is safeguarded for future country park-related development.
- 2.95 Railway Line: The north of Site GNLP3052 is located adjacent to a railway line. The proposed development at this site could potentially expose site end users to higher levels of noise pollution and vibrations associated with this railway. A minor negative impact would therefore be expected.
- 2.96 Air Pollution: The SA notes that WCP is proposed for non-residential end use and comprises 220.3ha. The proposed development at this site could potentially result in a significant increase in local air pollution; therefore, a major negative impact would be expected. However, this seems to assume that some form of

high density commercial development is proposed, whereas we are proposing to safeguard the site for open space and leisure uses. The masterplanning for the site could achieve benefits in air pollution terms and the SA should therefore record a positive impact.

- 2.97 SA Objective 2 – Climate Change Mitigation and Adaptation. In terms of Fluvial Flooding, the SA notes that the north of the site is adjacent to Whitlingham Great Broad and located within Flood Zones 2, 3a and 3b, such that proposed development could potentially locate some site end users in areas at risk of fluvial flooding; therefore, a major negative impact would be expected. However, the extensive nature of the site means that any proposed leisure development can be located such that users are kept away from areas at risk of fluvial flooding. Therefore the SA should record a positive impact in relation to site GNLP3052.
- 2.98 Surface Water Flooding: Small areas within the site coincide with areas determined to be at low, medium and high risk of surface water flooding. Development would be expected to have a major negative impact on pluvial flood risk, as development would be likely to locate site end users in areas at high risk of surface water flooding, as well as exacerbate pluvial flood risk in surrounding locations. However, this assumes significant built development and significant ground coverage which is not the case. The appropriate design and management of the extensive green space will facilitate on-site flood attenuation, with knock-on reduction in risk to surrounding locations as a result of controlled run-off, such that the SA should record a major positive impact.
- 2.99 SA Objective 3 – Biodiversity, Geodiversity and Green Infrastructure. SSSI IRZ: This section of 'The Broads' SAC and 'Broadland' SPA and Ramsar is also designated as 'Yare Broads and Marshes' SSSI. The site is located within an IRZ which states that "all planning applications (except householder) outside or extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats" should be consulted on. The SA assumes a minor negative impact on the features for which these SSSIs have been designated would be expected, due to development on natural greenspace. However, our proposal is to safeguard the additional WCP land for country park use, which can only benefit biodiversity, both by providing / protecting it on site,

and by providing space for leisure use, thus reducing human pressure on designated habitats elsewhere.

- 2.100 LNR: Site GNLP3052 coincides with 'Whitlingham' Local Nature Reserve. The proposed development at this site is for recreation and tourism end use associated with Whitlingham Country Park, which is coincident with this LNR. As this site is proposed for tourism and a Country Park, it is assumed that the developable area of the site will exclude the LNR itself, and therefore, a negligible impact on this LNR would be expected. We agree with this assessment.
- 2.101 CWS: Site GNLP3052 coincides with 'Old Wood', 'Trowse Wood' and 'Trowse Meadows' CWSs. The proposed development at this site is for recreation and tourism end use associated with Whitlingham Country Park, which is coincident with these CWSs. As this site is proposed for tourism use and a Country Park, it is assumed that the developable area of the site will exclude these CWSs, and therefore, a negligible impact on these CWSs would be expected. We agree with this assessment.
- 2.102 Priority Habitats: Site GNLP3052 coincides with deciduous woodland, coastal floodplain grazing marsh, and good quality semi-improved grassland priority habitats. The proposed development is considered by the SA to be likely to result in the partial loss of these habitats, and therefore, have a minor negative impact on the overall presence of priority habitats in the Plan area. However, the safeguarding of this site for additional country park usage means that habitats can both be safeguarded and created, leading to net gain.
- 2.103 SA Objective 4 – Landscape. National Park/Country Park: The majority of Site GNLP3052 coincides with The Broads National Park. A proportion of this area also coincides with Whitlingham Country Park. The proposed development at this site is for recreation and tourism end use associated with Whitlingham Country Park. The nature and exact location of the proposed development is unknown at this stage and therefore the impact on this National Park and Country Park is uncertain. Our proposal is to safeguard the site for country park usage, which can only benefit the country park as a whole.
- 2.104 Landscape Character: The majority of Site GNLP3052 is located within the LCA 'Yare Valley Urban Fringe'. Some key characteristics of this LCA include the

wide, flat floodplain, recreational landscape and green buffer between the river valley and Norwich City. Site GNLP3052 is proposed for recreation and tourism end use, and therefore, the proposed development at this site would be unlikely to be discordant with these key characteristics. We agree with this assessment.

- 2.105 Views from the PRoW Network: Site GNLP3052 coincides with a PRoW. Development could potentially alter the views experienced by users of the PRoW network; therefore, a minor negative impact on the local landscape would be expected by the SA. However, altered views are not necessarily altered in a negative way, and the impact should be recorded as neutral.
- 2.106 Views for Local Residents: Site GNLP3052 is located adjacent to the settlement of Trowse Newton. The SA considers that development would be likely to alter the views experienced by residents of surrounding dwellings to some extent, and therefore, a minor negative impact on the local landscape would be expected. However, as noted above, altered views are not necessarily altered in a negative way, and the impact should be recorded as neutral.
- 2.107 SA Objective 6 – Population and Communities. Local Services: The nearest local services WCP are Trowse Village Store in Trowse Newton, or Morrisons supermarket within Norwich City. The site is located outside the target distance to these services. The proposed development at these two sites could potentially have a minor negative impact on the access of site end users to local services. However, residential development is not proposed at this site, which is intended to be safeguarded for country park related development, thus a neutral impact should be recorded.
- 2.108 SA Objective 8 – Health. Main Road: the site is located adjacent to the A47, where development could potentially expose site end users to higher levels of traffic associated emissions, which would be likely to have a minor negative impact on the health of site end users. However, this assumes residential development, whereas we propose that the site is safeguarded for country park uses, and should therefore expected to have a minor positive impact on health.
- 2.109 GP Surgery: The closest GP surgery to the site is Lakenham Surgery, located approximately 1.5km to the north west, outside the target distance such that the SA assumes development would be expected to have a minor negative

impact on the access of site end users to GP surgeries. However, the site is proposed for country park related uses, not residential development.

- 2.110 As the site is located outside the target distance to an NHS hospital, GP surgery and leisure centre, development would be expected to have a major negative impact on the health and wellbeing of site end users. However, the site is proposed for country park related uses, not residential development, such that these services would not be required on a day to day basis, and country park usage would have a positive impact on health in itself.
- 2.111 SA Objective 11 – Economy. Employment Floorspace: the site is proposed for tourism end use. This would be expected to result in the provision of employment opportunities in the local area, and therefore, a major positive impact on the local economy would be expected as a result of development at these four sites. Site GNLP3052 currently coincides with 'Kingsley Farrington Boatyard' and 'Norfolk Snowsports Club'. Site GNLP3052 is proposed for tourism end use and it is assumed that the development will incorporate these existing facilities, and therefore, would be expected to result in a net gain in employment floorspace overall. We agree with this assessment.
- 2.112 SA Objective 12 – Transport and Access to Services. Bus Stop: the site is outside the target distance to a bus stop providing regular services. Therefore, the proposed development at these three sites could potentially have a minor negative impact on site end users' access to bus services. However, this could change with the significant amount of development proposed for this part of Norwich and with the development of the Loddon P&R site we are promoting.
- 2.113 Railway Station: The closest railway station to the site is Norwich Railway Station, located approximately 3km to the north west. A large proportion of the site is situated outside the target distance to this station. Therefore, the proposed development at these two sites would be likely to have a minor negative impact on site end users' access to rail services. However, we anticipate that the country park usage would be mainly beneficial for local users.
- 2.114 Pedestrian Access: The site is well connected to the existing footpath network. Development would be expected to have a minor positive impact on site end users' access to the PRow network and opportunities to travel by foot. We agree with this assessment.

- 2.115 SA Objective 13 – Historic Environment. Grade I Listed Buildings: The site is located approximately 40m from the Grade I Listed Building ‘Church of St Andrew’. The proposed development at this site could potentially alter the setting of this Listed Building, and therefore, a minor negative impact on the local historic environment would be expected by the SA. However, the nature of the proposed safeguarding of the site for country park usage can accommodate preservation of the setting.
- 2.116 Grade II* Listed Buildings: The site is located adjacent to the Grade II* Listed Building ‘Whitlingham Hospital Blocks 04, 05, 06’ and within 200m from several Listed Buildings along Yarmouth Road including ‘Thorpe Hall’ and ‘Walpole House’, but is separated from these Listed Buildings by the River Yare and woodland. Development at this site could potentially alter the setting of ‘Whitlingham Hospital Blocks 04, 05, 06’ and therefore a minor negative impact on the local historic environment would be expected. However, the nature of the proposed safeguarding of the site for country park usage can accommodate preservation of the setting.
- 2.117 Grade II Listed Buildings: Site GNLP3052 coincides with the Grade II Listed Building ‘Ruins of Trowse Newton Hall’ and is located adjacent to ‘Whitlingham Hospital Service Buildings, Block 03’, ‘Boundary wall and gateway at Whitlingham Hospital’, ‘Sunnydale’ and ‘Trowse Old Hall’. The proposed development at this site could potentially result in direct impacts on ‘Ruins of Trowse Newton Hall’ and therefore a major negative impact on the local historic environment would be expected. However, the nature of the proposed safeguarding of the site for country park usage can accommodate preservation of the setting.
- 2.118 Conservation Area: A small proportion of Site GNLP3052 coincides with Trowse with Newton Conservation Area. Therefore, the SA suggests development at this site could potentially alter the setting of this Conservation Area, and as such have a minor negative impact on the local historic environment. However, the nature of the proposed safeguarding of the site for country park usage can accommodate preservation of the setting.
- 2.119 Registered Park and Garden: Site GNLP3052 coincides with ‘Crown Point’ RPG. Development at this site could potentially have a direct impact on this RPG and

therefore a major negative impact would be expected. However, the nature of the proposed safeguarding of the site for country park usage can accommodate preservation of the RPG.

- 2.120 SA Objective 14 – Natural Resources, Waste & Contaminated Land. Previously Developed Land: All sites in this cluster comprise previously undeveloped land. Site GNLP3052 comprises 220.3ha of previously undeveloped land. The scale of development at this site is unknown at present, however, the proposed development could potentially result in a major negative impact on natural resources due to the loss of 20ha or more of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils. We disagree with this assessment, since our proposal relates to country park usage not extensive tracts of built development.
- 2.121 ALC: Site GNLP3052 is situated on ALC Grades 3 and 4 land. ALC Grade 2 and 3 are considered to be some of Greater Norwich’s BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at these four sites, due to the loss of this important natural resource. This assumes that the land would be built over, or would be available for agriculture, whereas we are proposing to safeguard the land for country park related uses, which are essentially reversible, such that a neutral impact should be recorded.
- 2.122 SA Objective 15 – Water B.52.15.1 SPZ: Sites GNLP3051, GNLP2069 and GNLP3049 coincide with the catchment (Zone III) of a groundwater SPZ. Site GNLP3052 coincides with the inner zone (Zone I), outer zone (Zone II) and catchment of a groundwater SPZ. The proposed development at these four sites could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources
- 2.123 Watercourse: Site GNLP3052 is located adjacent to the River Yare, with a proportion of the site located within 200m of this watercourse. Development could potentially increase the risk of contamination of this watercourse, and therefore, a minor negative impact would be expected. However, contamination is unlawful, and planning controls exist to ensure any surface water drainage is carried through stages of filtration before any outfall into rivers. Given the

proposed country park related uses, the SA should therefore record a neutral impact.

Octagon Farm

- 2.124 SA Objective 1 – Air Quality and Noise. Air Pollution: The sites are proposed for the development of dwellings. Development could potentially result in a significant increase in local air pollution and have a negative impact on air pollution in the local area.
- 2.125 We consider this to be inappropriate, since air quality issues depend upon the context of the site being proposed for development. In the case of Octagon Farm, the sites does not fall within an air quality management area, and is not proposed to be developed in a way that result in such designation.
- 2.126 SA Objective 2 – Climate Change Mitigation and Adaptation. Carbon Emissions: Development could potentially increase local carbon emissions, as a proportion of South Norfolk’s total, by more than 0.1%. Therefore, a minor negative impact on South Norfolk’s carbon emissions would be expected. In response we assert that the design of the development has yet to be finalised. There are opportunities through development management policies to ensure carbon emissions are minimised.
- 2.127 Surface Water Flooding: A proportion of the site coincides with areas determined to be at risk of surface water flooding which would have a major negative impact on pluvial flood risk, as development would be likely to locate site end users in areas at high risk of surface water flooding, as well as exacerbate pluvial flood risk in surrounding locations. However, the development of the Octagon Farm site (both site references) provides the opportunity to incorporate on-site surface water attenuation, which will not only ensure development can be protected from flood risk, but also protect the Listed Octagon Barn itself, and by reducing off-site flows will also control peaks of flooding beyond the site boundaries. This would therefore be recorded as a positive impact.
- 2.128 SA Objective 4 – Landscape. Landscape Character: All sites in this cluster are located within the LCA ‘Poringland Settled Plateau Farmland’. Some key characteristics of this LCA include large scale open arable fields, woodland, and densely settled core area. The sites comprise large areas of pasture and arable

land and could potentially be discordant with these key characteristics and would be expected to have a minor negative impact on the local landscape character. In this case, the site is well enclosed by vegetation, especially woodland to the north, so any landscape impact would be very localised and should therefore be recorded as neutral.

2.129 SA Objective 5 – Housing. Net Gain: Development would be expected to result in a major positive impact on housing provision. We agree with this assessment.

2.130 SA Objective 6 – Population and Communities. Local Services: The nearest convenience stores to this cluster, including Premier Grocery Store, Budgens, and One Stop Shop, are located within Poringland. The site is located either partially or wholly outside the target distance to these shops. Development could potentially have a minor negative impact on the access of site end users to local services. However, the site is proposed for mixed use development, where there is the opportunity to incorporate some top-up provision, and there are also bus stops immediately adjacent to the site.

2.131 Local Landscape Designations: Poringland contains several local landscape designations including Poringland Community Woodland, All Saints Road Open Space, Poringland Village Green and Carol Close play area. The list of sites are located within 600m from one or more of these features. The proposed development at these 16 sites would be likely to provide site end users with good access to these local features, and as such, result in a minor positive impact on opportunities for integration with the local community. We agree with this assessment.

2.132 SA Objective 8 – Health. Green Network: The site is located partially or wholly over 600m from a PRow or public greenspace, and therefore, the proposed development at these four sites could potentially have a minor negative impact on the access of some site end users to the local green network. However, the development site provides the opportunity to incorporate public open space and circular walks through the masterplanning process, resulting in a positive impact.

2.133 GP Surgery: Old Mill Surgery and Heathgate Surgery are both located within Poringland. The site is located outside the target distance to these GP surgeries, and therefore, the proposed development at these twelve sites would be

expected to have a minor negative impact on the access of site end users to GP surgeries. However, there are bus stops immediately adjacent to the site, to enable access by public transport.

- 2.134 Leisure Centre: The closest leisure facility to Poringland, Framingham Earl and Framingham Pigot is Riverside Leisure Centre, located approximately 7.2km north of the cluster. All 21 sites in this cluster are located outside the target distance to this leisure facility, and therefore, a minor negative impact on the health and wellbeing of site end users would be expected. However, there are bus stops immediately adjacent to the site, such that access can be facilitated by public transport, thus resulting in a neutral or positive impact.
- 2.135 SA Objective 10 – Education. Primary School: Poringland Primary School and Nursery is located in the centre of Poringland. The site is situated partially or wholly outside the target distance to this school. Development could potentially result in a minor negative impact on some site end users’ access to primary education. However, bus stops immediately adjacent to the site would facilitate a choice of accessibility.
- 2.136 Secondary School: Framingham Earl High School is located in the north of Poringland. The site is located within the target distance to this school, and therefore, development would be likely to result in a minor positive impact on site end users’ access to secondary education. We agree with this assessment.
- 2.137 SA Objective 11 – Economy. Primary Employment Location: Poringland Town Centre is located in close proximity to the Poringland, Framingham Earl and Framingham Pigot cluster. Roseberry Business Park is also located within 3km from this cluster. These locations would be expected to provide a range of employment opportunities for site end users. Therefore, the proposed development at all 20 sites would be expected to have a minor positive impact on the local economy. Employment Floorspace: The site is proposed for mixed use development including employment, commercial and business end uses. This would be expected to result in the provision of employment opportunities in the local area, and therefore, a major positive impact on the local economy would be expected as a result of development at this site. We agree with these assessments.

- 2.138 SA Objective 12 – Transport and Access to Services. Bus Stop: The site is located within the target distance to bus stops providing regular services. Development would be likely to have a minor positive impact on site end users’ access to bus services. We agree with this assessment.
- 2.139 Pedestrian Access: Site GNL0321 is well connected to the existing footpath network. Development would be expected to have a minor positive impact on site end users’ access to the PRow network and opportunities to travel by foot. Site GNL1032 currently has poor access to the surrounding footpath network. Development could potentially have a minor negative impact on local accessibility. However, we assert that the joint development of these 2 sites at Octagon Farm would mean both could benefit from and facilitate further access to the PRow network.
- 2.140 SA Objective 13 – Historic Environment. Scheduled Monument: GNL1032 is located approximately 300m from ‘Remains of Bixley Hall and associated garden water features’ SM, and Site GNL0321 is located approximately 520m from this SM. Development could potentially have a minor negative impact on the setting of these SMs. However, it is unlikely, given the intervening woodland to the north of the sites, and the ability to masterplan the development taking account of the significance of the heritage asset. Therefore, this impact should be recorded as neutral.
- 2.141 SA Objective 14 – Natural Resources, Waste & Contaminated Land. Waste: Development for dwellings would be expected to increase household waste production by more than 0.1% in comparison to current levels in South Norfolk and could potentially result in a minor negative impact on waste generation. However, all residential development results household waste irrespective of its location.
- 2.142 Previously Developed Land: All sites in this cluster comprise previously undeveloped land. Development would be likely to result in a minor negative impact on natural resources due to the loss of previously undeveloped land. These negative impacts would be associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils. The combined site (8.48ha), would indeed result in the loss of undeveloped land, as is the case for all sites that are not brownfield. Given the significant numbers of new

dwellings required, this is inevitable, and must be balanced with the positive impacts of providing housing, including affordable housing, and supporting the local economy and community vitality.

- 2.143 ALC: All sites in this cluster are wholly or partially situated on ALC Grade 3 land. Sites GNLP1032 and GNLP0485 are also partially situated on ALC Grade 2 land. All sites are situated on some of Greater Norwich's BMV land. Therefore, a minor negative impact would be expected as a result of the proposed development at these 21 sites, due to the loss of this important natural resource. We agree, but given the significant numbers of new dwellings required, this is inevitable, and must be balanced with the positive impacts of providing housing, including affordable housing, and supporting the local economy and community vitality.
- 2.144 SA Objective 15 – Water. All sites in this cluster coincide with the catchment (Zone III) of a groundwater SPZ. The proposed development at these 21 sites could potentially increase the risk of groundwater contamination within this SPZ, and therefore, result in a minor negative impact on local groundwater resources. We assert that the planning process prevents contamination from occurring, since the design and construction of the development will be required to ensure staged filtration of surface water prior to reaching the groundwater. Proposed uses would not include heavy industry.
- 2.145 Watercourse: Site GNLP1032 is located adjacent to The Beck, with the majority of the site located within 200m of this watercourse. The proposed development at this site could potentially increase the risk of contamination of this watercourse, and therefore, a minor negative impact would be expected. We assert that the planning process prevents contamination from occurring, since the design and construction of the development will be required to ensure staged filtration of surface water prior to discharge to local watercourses. Proposed uses would not include heavy industry.

3. The Part 2 Plan – Site Allocations

3.1 Part 2 comprises of Assessment Booklets, which consider the sites that have been put forward for development. The four sites referred to in this document are discussed as follows (N.B. the notes in the tables are taken from the assessment booklets, with our response thereafter):

3.2 Park Farm GNLPO323

3.3 Key Service Centres Non-Residential Assessment Booklet

General comments: Four representations in objection and one comment including representation from Bixley Parish Council and Poringland Parish Council.

Issues raised in the comments

- (1) Remote, site with poor unsuitable access from the highway, Poringland PC would oppose on these grounds but development otherwise welcome
- (2) Will attract additional traffic on already congested B1132
- (3) Would contribute to spread of urbanisation into the countryside
- (3) Housing requirement in the area already met: further development unnecessary [NB housing is not in fact included as part of this proposal]
- (4) No local infrastructure to support scale of development proposed
- (5) Agree with "official assessment" [i.e. the GNLPO HELAA suitability assessment concluding the site as unsuitable]

Supporting representation on behalf of the site promoter Arminghall Settlement.

Findings of HELAA contested: Client has sufficient landholdings in the area to ensure that adequate highway access can be created. Site provides an opportunity to serve an alternative employment market to that catered for by sites on the edge of Norwich, which command higher rents. Furthermore, it enables employment uses to be provided closer to existing settlements to the south of Norwich and will assist in reducing journey times and trip lengths to access such facilities – not acknowledged in the HELAA. HELAA Amber rating for landscape impact acknowledges impacts can be mitigated: site well-screened and surrounded by land within the same ownership therefore potential to mitigate any potential landscape impact. Site is low lying and screening acts to limit views of the existing farm buildings from publicly accessible areas. A carefully designed layout would work to limit both short range and long range views towards the development. The design would also work with the locally characteristic vegetation noted in the published Landscape Character Assessment, such as small areas of woodland and hedgerows with trees, to further limit or mitigate views. Amber rating for townscape impact in the HELAA can be similarly mitigated although it is not clear which aspect of townscape is likely to be impacted on.

GNLPO323 is put forward for commercial use accessed from the B1322 Bungay Road. The site size is 9.83 ha and given the significant existing commitment for strategic employment land GNLPO323 is not preferred for further assessment.

Constraints on development include highways access, surface water flood risk on part of the site, and heritage issues to the setting of the Church of St Wandregelius (Grade II* listed). The site is considered an unreasonable alternative for further assessment.

Summary: This site is not considered to be suitable for allocation as evidence suggests that currently committed land is more than sufficient in quantity and quality to meet the employment growth needs in Greater Norwich. There is therefore no need to allocate any additional large-scale employment sites in the new local plan. Constraints on development include highways access, surface water flood risk on part of the site, and heritage issues to the setting of the Church of St Wandregelius (Grade II* listed).

- 3.4 The Part 1: Strategy document focusses very heavily on the growth of employment in high value, technical sectors. Policy 6 – The Economy states that sufficient land is allocated in accessible locations to meet need. The need arises from background evidence in an Employment Land Assessment, which does not consider the growth or support of low-tech business sectors, which have different needs and values. Policy 6 focusses allocations into strategic employment areas where new buildings are inappropriate and/or out of financial reach for the type of low-tech business attracted to locations such as Park Farm. This is contrary to the Plan’s objective of a broad-based economy, and to the reference in Policy 6 to the appropriate re-use of rural buildings.
- 3.5 We have therefore objected to Policy 6 and associated background documents and aspirations stated in the Plan, on the basis that the policy should include reference to the way that low value or low-tech business needs such as storage will be supported as part of the broad-based economy. Whilst this may well be served through criteria-based policies at the District Level, it is important to note that the lack of an allocation at Park Farm means that it may be difficult to rely on countryside-based policies for future consolidation of the uses, confidence from future occupiers, and confidence in related investment such as the access. Allocating the site in the Part 2 document will acknowledge its contribution to the range of businesses supported by the growth agenda. The plan acknowledges in the “alternative approaches” section of Policy 6 that detailed changes might be justified.
- 3.6 As noted elsewhere in this representation, Policy 6 should therefore include reference in section 2 to low-tech as well as smaller and start-up businesses, with additional or amended bullet points to refer to low-tech and low-value

employment in appropriate locations such as Park Farm. On that basis, the formal allocation of Park Farm would be a natural conclusion.

- 3.7 Whilst the Part 2 assessment of the site suggests that there is simply no need for Park Farm to be allocated, as there is sufficient land already allocated, we object on the basis that the other land is high-value and not the right type of development for the type of user that is attracted to such locations as Park Farm.
- 3.8 Highway access is noted as a constraint. Please see the Transport Technical Note submitted with this representation, which includes visibility splays and swept path analysis and shows how accessibility is assured and safe.
- 3.9 Heritage is also noted as a constraint, associated with the setting of the Church of St Wandregelius. However, the site is proposed to utilise existing accesses and existing buildings, such that the setting of the listed church will remain largely unchanged in terms of character, and similar in appearance. Nevertheless, a heritage Statement will be provided in due course to support future stages of the GNLP preparation.
- 3.10 The site is within Flood Zone 1, low risk, for planning purposes and passes the sequential test. However, as it is greater than 1 ha, surface water is to be considered through a Flood Risk Assessment (FRA) as part of any future planning application. The FRA will demonstrate that the proposed development would be safe for the lifetime of the development without increasing flood risk elsewhere, and where possible, that the development will reduce flood risk overall.
- 3.11 The site should therefore be allocated for low-tech B1 development.

3.12 Octagon Farm GNLP0321 and GNLP1032

- 3.13 Poringland, Framingham Earl and Framingham Pigot (including well related parts of Bixley, Caistor St Edmund and Stoke Holy Cross) Assessment Booklet

The GNLP has assessed Octagon Farm as part of the wider Poringland "Assessment Booklet" which includes other well-related parts of Parishes. It notes that Poringland is a Key Service Centre, and has a range of services including a post office, supermarket, other stores, pubs, restaurants/take-aways, two doctors' surgeries, a dentist, a primary school, a high school, two community halls, as well as recreation facilities at the High School and some local

employment. The settlement is well connected to Norwich by bus. A Neighbourhood Plan is being prepared but this only covers the Parish of Poringland. Drainage is a constraint in the wider area.

GMLP0321 Mixed use development consisting of approx. 60 dwellings, commercial, business and light industrial space. Unreasonable. This site is not considered to be suitable for allocation as although there is a footpath and cycle link along the east side of the B1332 to local facilities there is relatively little development on the eastern side of the B1332. Development in this location would also impact on the setting of Octagon Barn. In addition, high amounts of existing commitments and environmental/ infrastructure constraints limit the potential for additional new housing in Poringland.

GMLP1032 Mixed use with commercial business use and approx. 100 dwellings, landscaping and infrastructure. Unreasonable. This site is not considered to be suitable for allocation as although there is a footpath and cycle link along the east side of the B1332 to local facilities there is relatively little development on the eastern side of the B1332. In addition, development would impact on the setting of Octagon Barn. There was some discussion over the site's potential if allocated with GMLP0321, but the majority of the site is affected by surface water flood risk which would significantly constrain the developable area. High amounts of existing commitments and environmental/ infrastructure constraints limit the potential for additional new housing in Poringland.

- 3.14 The two sites were promoted as mixed use development, but have been dismissed on the basis of extending linear development to the north of Poringland. However, we assert that the site represents the rounding-off of built form, given the extensive development on the opposite side of the road. The woodland to the north already sets a natural boundary to further extension of the village in a northwards direction.
- 3.15 The sites are sustainable in terms of location and accessibility by means of transport other than the car. As noted by the GMLP there is already a footway along the road, and the high school is a matter of a few minutes' walk. There are also bus stops immediately adjacent to the site. The opportunity for small-scale employment would also contribute the sustainability of the settlement, as per the 4.3ha of land intended to be allocated for employment use. The sites were assessed as suitable for further consideration in the HELAA assessment.
- 3.16 The Part 2 assessment states that northern site (GMLP1032), suffers from surface water flood risk, and the southern site may affect the setting of Octagon Barn.

- 3.17 It is intended to provide a framework masterplan in due course to support the allocation of the joint site for mixed use development. This will show how development could be laid out, with particular emphasis on enhancing the setting of Octagon Barn and enhancing the site's role as a local visitor destination through the appropriate design and siting of the commercial buildings. A supporting heritage statement would provide reassurance as to the ability to develop the site without undue harm to the significance of heritage assets.
- 3.18 Highway access is noted as a constraint. Please see the Transport Technical Note submitted with this representation, which includes visibility splays and swept path analysis and shows how accessibility is assured and safe.
- 3.19 The site is within Flood Zone 1, low risk, for planning purposes and passes the sequential test. However, as it is greater than 1 ha, surface water is to be considered through a Flood Risk Assessment (FRA) as part of any future planning application. The FRA will demonstrate that the proposed development would be safe for the lifetime of the development without increasing flood risk elsewhere, including improving the existing flood risk scenario associated with Octagon Barn.
- 3.20 The site should therefore be allocated mixed use development.
- 3.21 Loddon Park and Ride GNL3051 – Land at junction of Loddon Road / Bungay Road, Bixley**
- 3.22 Urban Fringe Non-Residential Assessment Booklet and HELAA Addendum II
- 3.23 The Assessment Booklet considers the proposal for a Park and Ride at this site to be "a reasonable alternative for further consideration." This is welcomed. It is noted in the Assessment Booklet that the need for a new Park and Ride at this site is not yet certain, and will be clarified by the Transport for Norwich strategy which will become the long-term plan for the provision of park and ride facilities in the local area.
- 3.24 The HELAA Addendum has not assessed the Loddon Park and Ride site in detail – however, it does acknowledge that there are no absolute constraints to the site and the site is well-related to the strategic road network.

- 3.25 The current site (GNLP3051) was promoted through the Part 1 Regulation 18 consultation as an alternative to the site identified as TROW2 in the adopted Site Specific Allocations and Policies Documents for South Norfolk Council (2015). However, it is noted that TROW2 is not being carried forward as an allocation for P&R. It would therefore be logical to consider that the current site should now be allocated as a Park and Ride to make up for the loss of TROW2 (to meet existing identified need), rather than remaining as a reasonable alternative.
- 3.26 The Part 2 Local Plan states that the need for the site (GNLP3051) depends on the long-term plan for the provision of park and ride facilities to serve the local area, and the new Transport for Norwich Strategy which is currently under review. It would be prudent to carry out our own transport work to demonstrate the need for a Loddon Park and Ride in advance of the Transport for Norwich Strategy.
- 3.27 Our Park and Ride proposal also fits in with the Local Plan's aims to increase sustainable transport use (including Park and Ride use) to combat climate change, which will necessarily involve developing the role of the wider Park & Ride system around Norwich.
- 3.28 The GNLP Vision states that where journeys are still undertaken by car, this will increasingly be via electric vehicles. This favours our proposal, since it will be possible to incorporate electric vehicle charging infrastructure into the Park and Ride construction, for availability from day one.
- 3.29 The draft GNLP sets out an aim to increase travel via sustainable modes of transport. The allocation of the Loddon Park and Ride site is sound and fits in with the GNLP in terms of sustainable transport. Please see the Transport Technical Note submitted with this representation, which notes that Park and Ride is a cornerstone of Norfolk County Council's transport policy. The proposed site represents a missing point on the major routes into Norwich, which all otherwise have P&R provision. The Transport Technical Note has reviewed collision data in the vicinity and concludes that there are no inherent highway safety issues associated with the alignment of the local highway network which could be exacerbated by the development proposals.

- 3.30 The Transport Technical Note includes access design proposals, where visibility splays and swept path analysis demonstrate how accessibility is achieved safely and in accordance with current standards.
- 3.31 We anticipate responding further on this matter once the County Council's P&R review is published.
- 3.32 The site is also suitable in terms of landscape, heritage, drainage and ecology, which will be demonstrated by technical reports covering these matters to be submitted in due course to support the proposed allocation as the GBNLP process continues.

3.33 Whitlingham Country Park GNLP3052

3.34 Urban Fringe Non-Residential Assessment Booklet

Whitlingham Country Park is land southwards of Whitlingham Broad to the A47 Southern Bypass that is promoted for extending the Country Park. In total the proposal for Whitlingham Country Park measures 200ha. This proposal is considered to be a reasonable alternative for further consideration but is not preferred for allocation at the current time as more details are required about the exact nature of the plans. The land promoted is also mostly within the Broads Authority administrative area, for which there are policies relating to Whitlingham Country Park.

- 3.35 East Norwich, promoted under Policy 7 anticipates redevelopment of sites very close to WCP for 2,000 homes. Green infrastructure is therefore important in this location, and the 5th bullet points (2nd set) in the policy requires enhanced linkages to the Broads, including pedestrian and cycle links between WCP and the city centre.
- 3.36 We therefore assert that the additional land at WCP should be safeguarded so that it can be called upon to support the additional population arising from new development in the locality. Formally safeguarding the site for leisure and open space purposes through policy will provide confidence in investment within the Park, to support this increasing demand.
- 3.37 Policy 3 – Environmental Protection and Enhancement, refers to the possible establishment of new country parks and additional forms of green infrastructure, but should also refer to opportunities to enhance existing country parks to improve the environment and range of activities and facilities for their users.

3.38 The Policies of the Broads Authority referred to are local-level development control policies relating to the existing extent of the Park, so are not adequate to set out strategic level policy for safeguarding the extended area for country park related uses.

4. Summary and Conclusion

- 4.1 Park Farm, Bixley, presents an opportunity to provide low-tech, low value space for employment, in order to support the GNLP's intentions regarding a wide range of employment types. The site already contains buildings which can be converted and therefore represents brownfield land, such that physical impacts upon the locality would be negligible. The Transport Technical Note accompanying this representation demonstrates that the site can accommodate associated traffic safely.
- 4.2 Octagon Farm is located just outside Poringland, a high order settlement in the hierarchy, which presents the opportunity to round off development at the northern end of the village, utilising existing natural boundaries. The mixed use development proposed would support the existing employment use at Octagon Barn and the wider vitality of the village, without detriment to the heritage asset.
- 4.3 The proposed safeguarding of additional land for country park related uses associated with WCP is a major benefit for the GNLP, being located closely to the GNLP's proposed significant development at East Norwich, where it could be called upon to support the additional population through the provision and enhancement of natural greenspace and active leisure uses.
- 4.4 The proposed Loddon Park & Ride site would further support development of east Norwich by removing congestion and pollution from this last remaining route into the city that doesn't benefit from P&R facilities. The transport Technical Note accompanying this this representation demonstrates that the site will contribute significant benefits whilst maintaining highway safety and the free flow of traffic on the A47.
- 4.5 We look forward to the provision of further evidence at the next stage of the GNLP process, particularly in relation to the review of P&R provision and need around the city. We intend to submit more detailed evidence to support the allocation / safeguarding of the four sites covered by this representation. We look forward to engaging with the Greater Norwich Local Plan team through the preparation of the Regulation 19 Pre-submission Local Plan.